

**FILED****AUG -8 2023****THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT****UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION****Magistrate Judge Schneider**

UNITED STATES OF AMERICA

vs.

ASHLEY MINNICK

**UNDER SEAL**No. **23 CR 50031**Violation: Title 18, United States  
Code, Section 922(a)(6); Title 18,  
United States Code, Section 922(d)(1)**COUNT ONE**

The SPECIAL OCTOBER 2022 GRAND JURY charges:

On or about July 23, 2021, in Loves Park, in the Northern District of Illinois,  
Western Division,

ASHLEY MINNICK,

defendant herein, in connection with the acquisition of a firearm, namely a Glock model 26 Gen 5 9mm caliber pistol with serial number AFSF090, and a Glock model 30 Gen 4 .45 caliber pistol with serial number BTZA429, from Leo's Guns and Range, located in Loves Park, Illinois, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did knowingly make a false and fictitious written statement to Leo's Guns and Range, which statement was intended and likely to deceive Leo's Guns and Range as to a fact material to the lawfulness of the sale of the firearm to defendant under Title 18, United States Code, Chapter 44, in that defendant represented on the Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, that she was the actual buyer of

the firearm, when, in fact, as defendant then knew, she was not the actual buyer of the firearm;

In violation of Title 18, United State Code, Section 922(a)(6).

**COUNT TWO**

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about March 23, 2022, in Loves Park, in the Northern District of Illinois,  
Western Division,

ASHLEY MINNICK,

defendant herein, in connection with the acquisition of a firearm, namely a Glock model 29 Gen 4 10mm caliber pistol with serial number BWKB563, from Leo's Guns and Range, located in Loves Park, Illinois, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did knowingly make a false and fictitious written statement to Leo's Guns and Range, which statement was intended and likely to deceive Leo's Guns and Range as to a fact material to the lawfulness of the sale of the firearm to defendant under Title 18, United States Code, Chapter 44, in that defendant represented on the Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when, in fact, as defendant then knew, she was not the actual buyer of the firearm;

In violation of Title 18, United State Code, Section 922(a)(6).

**COUNT THREE**

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about March 26, 2022, at Loves Park and Rockford, in the Northern District of Illinois, Western Division,

ASHLEY MINNICK,

defendant herein, did knowingly dispose of a firearm, namely, a Glock GMBH model 29 Gen 4 10mm caliber pistol with serial number BWKB563, to Tyrone Anderson knowing and having reasonable cause to believe that Tyrone Anderson had been convicted of a crime punishable by a term of imprisonment exceeding one year;

In violation of Title 18, United States Code, Section 922(d)(1).

**FORFEITURE ALLEGATION**

The SPECIAL OCTOBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(a)(6) as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Glock model 26 Gen 5 9mm caliber pistol with serial number AFSF090, a Glock GMBH model 29 Gen 4 10mm caliber pistol with serial number BWKB563, a Glock model 30 Gen 4 .45 caliber pistol with serial number BTZA429 and associated ammunition.

A TRUE BILL: 

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY